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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

3:25-cr- 00131-1M

**v.**

**INDICTMENT**

**JASON DAVID CAMPOS,**

**18 U.S.C. § 1343**

**18 U.S.C. § 2261A(2)(B)**

**Defendant.**

**18 U.S.C. § 1028A(1)**

**Forfeiture Allegation**

**UNDER SEAL**

**THE GRAND JURY CHARGES:**

**INTRODUCTORY ALLEGATIONS:**

At all times material hereto;

1. Defendant JASON DAVID CAMPOS was a resident of the State of California.
2. “Adult Victim 1” (AV1) was a resident of the State of California who later moved to Oregon, and lived in the Portland, Oregon area.
3. “Attorney 1” is an attorney licensed to practice in the State of Oregon whose principal place of practice is in the District of Oregon. Attorney 1 maintains access to, and used, email and online cloud storage as part of his business practice.
4. AV1 was a client of Attorney 1.
5. AV1 was the creator and owner of the email address  
“midas2341[.]Hotmail[.]com.”

*Internet and Interstate Communications*

6. The creation and use of cloud storage accounts and services or an electronic mail service , as well as access to, and sending, viewing, or retrieving of a file or an electronic mail or an electronic mail message, as well as other similar virtual transactions, involves a broadcast over the relevant network, access to datacenters and servers, and corresponding verification that involves transmissions of writings, signs, and signals by wire in interstate and foreign commerce, and constitutes the use of interactive computer services, electronic communication services, and electronic communication systems of interstate commerce.

7. Each communication with an address on the Internet similarly involves a broadcast over the relevant network, access to datacenters and servers, and corresponding verification transactions that involve transmissions of writings, signs, and signals by wire in interstate and foreign commerce and constitutes the use of interactive computer services, electronic communication services, and electronic communication systems of interstate commerce.

8. Social media websites and public form websites are online platforms where users and subscribers can share information with other users and virtual communities in the form of text, video, photos and other content. The creation of a social media account, as well as viewing or accessing other attributes of the social media website or forum including sending, viewing, or retrieving of an electronic mail or an electronic mail message, as well as other similar virtual transactions, such as the creation and access of electronic mail accounts, involves a broadcast over the relevant network, access to datacenters and servers, and corresponding verification that involves transmissions of writings, signs, and signals by wire in interstate and foreign commerce,

and constitutes the use of interactive computer services, electronic communication services, and electronic communication systems of interstate commerce.

*Email and Websites*

9. Proton Mail is a secure email service that uses end-to-end encryption to protect users' messages. Proton Mail's headquarters are in Geneva, Switzerland, and its primary datacenter is in Zurich, Switzerland.

10. Proton Mail is owned and operated by Proton Technologies AG and maintains a presence on the Internet at [www\[.\]proton\[.\]me](http://www.proton.me) and offers free email accounts with data storage.

11. Google is a wholly owned subsidiary of Alphabet Inc., an American multinational technology conglomerate holding company headquartered in Mountain View, California, and is a holding company for Alphabet's internet properties and interests.

12. Google Mail, or "Gmail" is a free, web-based email service provided by Google, allowing users to send, receive, and manage electronic mail as well as other internet-based services provided by Google.

13. Before its rebranding, Hotmail was a free, web-based email service provided by Microsoft, allowing users to send, receive, and manage electronic mail as well as other internet-based services provided by Microsoft. Hotmail is the former name of Microsoft's email service, which is now known as Outlook.com. Legacy Hotmail accounts still retain functionality.

14. Kik Messenger, or "Kik," is a freeware instant messaging mobile application owned by US-based holding company MediaLab. The application uses an internet connection to transmit and receive messages, photos, videos, and other content after users register a username. Users create accounts with a unique username or email address, rather than requiring a phone number. When a user sends a message, it is transmitted over their internet connection to Kik's

servers. Kik's servers relay the message to the intended recipient based on their username who then receives the message from the server and displays it in the recipient's chat window. Kik utilizes a combination of its own widely distributed servers and cloud infrastructure for its operations.

15. Dropbox[.]com is a file hosting service operated by the American company Dropbox, Inc., headquartered in San Francisco, California, that offers cloud storage, file synchronization, personal cloud storage, and client software. Data storage servers are located in data centers across the United States. Among other services, users with an account may upload data and files to which they can grant access by others, who may then download the data and files.

16. During all times material hereto, the website "cumonprintedpics[.]com (Website 1) was a public forum website containing user-contributed pornography that had administrative offices or representatives in Delaware, to which users could contribute and view pornographic images and videos for viewing and comment by others through discussion boards. The website heading describes itself as, "The ORIGINAL cum Tribute Porn Forums Social Network and Gallery! CumOnPrintedPics posts your girls to get cum tributed, COCK tribute and photoshop faked nude! All your tributeme 24/7 fun." Website 1 is now offline.

*Conduct 2004 - 2013*

17. Before and during January 2004, while living in the State of California, defendant and AVI were engaged in an intimate, consensual relationship, during which defendant took digital photographs of AVI with her consent while she was nude. Defendant JASON DAVID CAMPOS owned both the digital camera and the computer on which the digital images were stored.

18. During May 2007, while still in the relationship, defendant JASON DAVID CAMPOS told AV1 that the laptop containing the photographs had been stolen from his vehicle.

19. In November 2008, AV1 and defendant decided to end their relationship.

20. During February 2009, AV1 became aware that the images taken by defendant JASON DAVID CAMPOS had been posted or contributed to various internet social media platforms, other centralized networks for advertising goods and services, and sexual advertisements. AV1 did not create or contribute to the accounts displaying her images or consent to the images' display.

21. On or about April 22, 2012, defendant JASON DAVID CAMPOS accessed Website 1 and created an account using AV1's first name and maiden name without her consent, and used an unverified email account "something[.]yahoo[.]com."

22. On or before May 10, 2013, defendant JASON DAVID CAMPOS accessed Website 1 and, without her consent, created a post entitled "San Jose Whore [containing elements of AV1's name]" and included several of the previously taken nude photos of AV1, provided the email address for AV1's then-boyfriend and invited those viewing it to ejaculate on the photographs and send them to an email address he claimed to belong to AV1's current boyfriend.

23. On or about May 15, 2013, defendant JASON DAVID CAMPOS accessed Website 1 and, using the maiden name of AV1, created a public post entitled "San Jose California's [maiden name of AV1]" and, without her consent, included several nude images of AV1.

*2020 Conduct*

24. On or about May 17, 2020, defendant JASON DAVID CAMPOS, using the maiden name of AV1, accessed Website 1 and created a public post, without her consent, entitled “Public Shame [maiden name of AV1]” that included several of the previously taken nude photos of AV1 and wrote “This cheating slut deserves to be shared with the world. Email [him/her] and tell [him/her] what you’d do to [him/her]. I’ll give social media to anyone who posts [his/her] replies here. Scare [him/her], BM [him/her], do whatever you want. This bitch has it coming. [His/her] email is [AV1’s email address],” which posts garnered several replies from the Website 1 community.

25. On or about May 19, 2020, defendant JASON DAVID CAMPOS, using the maiden name of AV1 without her consent, accessed Website 1 and created a post that read “This bitch still hasn’t figured it out. Keep it going guys. Shes [sic] freaking out lol. Took down [his/her] socials though. Going to have to find another way to get to [him/her].”

26. On or about May 19, 2020, defendant JASON DAVID CAMPOS, created the Gmail account “midas2341[*@*]gmail[.]com” using the maiden name of AV1 as a username, and created “jcampos.affirm[*@*]gmail[.]com” with username “[maiden name of AV1].” AV1 did not consent to the use of her name.

27. On or about August 11, 2020, defendant JASON DAVID CAMPOS accessed Website 1 and, using the maiden name of AV1, created a public post entitled “Cum on fake [AV1]” that contained 20 nude photos of AV1, without her consent, and identified the cities of her residence.



28. On or about December 17, 2020, accessed Website 1 and, using the maiden name of AV1, created a public post entitled “[maiden name of AV1]” and, without her consent, included several previously taken nude images of AV1.

*2021 Conduct*

29. On or about July 16, 2021, defendant JASON DAVID CAMPOS visited [www\[.\]proton\[.\]me](#) and created the email account “te[xxxxxxx]ge[[@](#)]protonmail[.]com” which displayed the maiden name of AV1.

30. On or about August 2, 2021, defendant JASON DAVID CAMPOS accessed a website called “anusib[.]com” using an account “te[xxxxxxx]ge[[@](#)]protonmail[.]com” which displayed the maiden name of AV1 and created a post which displayed nude images of AV1 and accurately stated that AV1 was from a specific city in Oregon and lived in a specific neighborhood and stated, “Anyone up to print these [photographs] out and post them around the area? Above urinals, at stop lights, even on those community boards. Take a picture of your work and send me the location.”

31. On or about August 21, 2021, defendant JASON DAVID CAMPOS sent an email to Attorney 1 from the email account “te[xxxxxxx]ge[[@](#)]protonmail[.]com” which displayed the maiden name of AV1, identified the first name of AV1, and requested a copy of her attorney-client file, without her knowledge or consent. The email requested a zip-file (digitally compressed) copy of any files from AV1’s case.

32. On or about August 21, 2021, and in response to the email in the forgoing paragraph, Attorney 1 uploaded a copy of AV1’s attorney-client file to DropBox.com, and replied to the email purporting to be from AV1 with a link to the file, which authorized access to the contents.

33. On or about August 23, 2021, Attorney 1 received an email notification from Dropbox.com which stated that the attorney-client file had been downloaded by the recipient.

34. On or about August 26, 2021, defendant JASON DAVID CAMPOS contacted www[.]proton[.]me and created the email account “milkmustache[@]protonmail[.]com”. This account was linked by terms of service IP address to his email account “midas2341[@]gmail[.]com.” [“midas2341” is the same username but different service provider as AV1’s email address at the time they and CAMPOS were in a relationship.]

35. On or about September 4, 2021, and through September 27, 2021, as part of the email thread with Attorney 1, defendant JASON DAVID CAMPOS replied to the email from Attorney 1 from the email account “te[xxxxxxx]ge[@]protonmail[.]com” with three of the previously obtained nude photographs of AV1, sent without her consent.

36. On December 17, 2021, defendant JASON DAVID CAMPOS, accessed Website 1 and using the account with the maiden name of AV1, uploaded two nude images of AV1 without her consent.

37. On or about January 22, 2022, defendant JASON DAVID CAMPOS sent AV1 an email from milkmustache[@]protonmail[.]com asking, “Sorry for the random question but is this [name of AV1’s son] mom?”

*2022 Conduct*

38. On or about Feb 5, 2022, defendant JASON DAVID CAMPOS sent AV1 an email from milkmustache[@]protonmail[.]com asking, “is this [first name of AV1]?”

39. On or about July 14, 2022, defendant JASON DAVID CAMPOS sent an email to Attorney 1 from the email account “te[xxxxxxx]ge[@]protonmail[.]com” asking “would you like more?”



40. On or about or before February 25, 2022, defendant JASON DAVID CAMPOS obtained and accessed the application Kik Messenger and created an account with the username “midas2341,” and, without her consent, designated account name in the maiden name of AV1, and used the email address “te[xxxxxxx]ge[.]protonmail[.]com.”

*2023 Conduct*

41. On or about February 11, 2023, defendant JASON DAVID CAMPOS accessed the Kik messenger application and engaged in a chat message with an unknown individual during which he sent nude photos of AV1 without her consent to the chat participant, engaged in discussion of sexual topics, and encouraged the user to send images and videos of the other participant to an email account belonging to AV1 while masturbating, which read in part:

[Maiden name of AV1]: Want to cum on my pictures?

User Bearly: Not if your a bot

[Maiden name of AV1]: Do I sound like a bit?

[Maiden name of AV1]: Bot

User Bearly: Ok add me

[Maiden name of AV1]: Email me midas2341[.]hotmail[.]com

42. On or about February 11, 2023, defendant JASON DAVID CAMPOS accessed the Kik messenger application and engaged in a chat message with an unknown individual during which he sent nude photos of AV1 to the chat participant and engaged in discussion of sexual topics and encouraged the user to send images and videos of the other participant to an email account belonging to AV1 while masturbating, which read in part:

[Maiden name of AV1]: Hi. 22f

[Maiden name of AV1]: Want to cum on my pictures?

User McJaguar: 29 and hell ya [emoji]

[Maiden name of AV1]: Email me midas2341[.]hotmail[.]com

**COUNT 1**  
**(Stalking)**  
**(18 U.S.C. § 2261A(2)(B))**

43. The Introductory Allegations are realleged and incorporated herein.

44. From at least May 17, 2020, and continuing to February 11, 2023, in the District of Oregon and elsewhere, defendant JASON DAVID CAMPOS, with the intent to harass or intimidate another person in the District of Oregon, to wit: AV1, a former intimate partner of defendant, used facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to AV1.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

**Count 2**  
**(Wire Fraud)**  
**(18 U.S.C. § 1343)**

45. The Introductory Allegations are realleged and incorporated herein.

46. AV1 retained the services of Attorney 1, to whom she paid a fee, and who maintained notes, documents and writings in an attorney-client file which represented work product in the course of rendering legal services.

47. It was part of defendant JASON DAVID CAMPOS's scheme and artifice to defraud to create email accounts defendant believed to be immune or resistant to legal process from the United States.

48. It was part of defendant JASON DAVID CAMPOS's scheme and artifice to defraud to create an email address bearing the maiden name of AV1 to lend credibility and authenticity to the email and to mislead recipients that the email was from AV1.

49. It was part of defendant's scheme and artifice to defraud, and by means of materially false and fraudulent pretenses and representations, to obtain attorney/client information and work product which contained personal and privileged information and communications about AV1 for the purpose of harassing and vexing AV1.

50. As part of defendant JASON DAVID CAMPOS's scheme and artifice to defraud, defendant visited [www\[.\]proton\[.\]me](http://www.proton.me) and created the email account "te[xxxxxxx]ge[@]protonmail[.]com" which contained AV1's maiden name, on or about July 16, 2021.

51. As part of the scheme and artifice to defraud, defendant JASON DAVID CAMPOS contacted [www\[.\]proton\[.\]me](http://www.proton.me) and created the email account "milkmustache[@]protonmail[.]com" on or about August 26, 2021.

52. As part of defendant JASON DAVID CAMPOS's scheme and artifice to defraud, defendant, beginning on or about July 16, 2021, and continuing to at least July 14, 2022, accessed and sent email from both email accounts, "te[xxxxxxx]ge[@]protonmail[.]com," and "milkmustache[@]protonmail[.]com" as more particularly set forth above.

53. On or about August 21, 2021, defendant **JASON DAVID CAMPOS** caused an electronic mail to be sent to Attorney 1 in the District of Oregon from the Proton mail account located outside of the District of Oregon, "te[xxxxxxx]ge[@]protonmail[.]com," that purported to be from his client AV1 for the purpose of impersonating AV1 and deceiving Attorney 1 as to his true identity to gain access to and receive a copy of her attorney/client file, who then

uploaded a copy of AV1's attorney-client file to Dropbox.com where it was then accessed and downloaded by defendant, as requested in the email from "te[xxxxxxx]ge[@]protonmail[.]com.

54. In so doing, defendant JASON DAVID CAMPOS transmitted or caused to be transmitted by means of wire, in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme.

55. All in violation of Title 18, United States Code, 1343.

**Count 3**  
**(Aggravated Identity Theft)**  
**(18 U.S.C. § 1028A(1))**

56. The Introductory Allegations are realleged and incorporated herein.

57. On or about or between July 16, 2021, and continuing to at least July 14, 2022, in the District of Oregon, defendant JASON DAVID CAMPOS did knowingly possess and use, without lawful authority, a means of identification of another person, the maiden name of AV1, an actual person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit Wire Fraud, a violation of 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person.

58. All in violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Count 2 (Wire Fraud) of this Indictment, defendant JASON DAVID CAMPOS shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.

Dated: April 8, 2025

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

WILLIAM M. NARUS  
Acting United States Attorney

GREGORY R. NYHUS, OSB #913841  
Assistant United States Attorney